



**Connecticut Department of
Energy & Environmental Protection
Bureau of Energy and Technology**

Confirmation Receipt

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July 1, 2016

Via Electronic Mail and First Class Mail

Jeffrey R. Gaudiosi, Esq.
Acting Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 16-02-28 – 2016 PURA Review of Connecticut Public Service Company Plans for Restoration of Service that is Interrupted as a Result of an Emergency

Dear Mr. Gaudiosi:

On behalf of Comcast of Connecticut, Inc. ("Comcast" or the "Company"), enclosed please find the Company's updated plan for restoring service which is interrupted as a result of an emergency, as required by §16-32e(b) of the General Statutes of Connecticut, as amended by Public Act 12-148, *An Act Enhancing Emergency Preparedness and Response*.

In addition, in accordance with the statute, copies have been provided to the Department of Emergency Services and Public Protection, and each municipality within the Company's service area.

Please do not hesitate to contact the undersigned or Tara Trifon of this office (860-541-7740) should you have any questions with regard to this submission.

Very truly yours,



David W. Bogan

Enclosure

**Cc: Department of Emergency Services and Public Protection
Municipalities Located Within Each Comcast Franchise Area**

AM 58230591.1



Connecticut Region

Incident Management Plan

For Emergencies Please Call

Comcast's Network Operations and Surveillance Center (XOC)

1-800-556-9979

Or, Northeast Division Business Continuity Manager

Wesley Decker

606-296-5502

Executive Summary

This document provides an overview of Comcast of Connecticut's¹ ("Comcast") Incident Management Plan ("IMP").² Comcast's current IMP incorporates the Federal Emergency Management Agency's ("FEMA") Incident Command Structure widely used by many public agencies and private companies in responding to incidents.

Natural disasters by their very nature are sudden, unexpected and unpredictable. Storms and associated business interruptions are occurring more often than in the past. A well thought out emergency management plan enables an organization to reduce the impacts of an emergency and return to normal operations sooner. This IMP provides a guide for all managers and employees during and after an emergency, and maps out the process for resuming normal business operations after an emergency. The plan spells out the roles and responsibilities of the Incident Management Team members involved in the incident management process. It contains procedures for contacting team members, vendors, suppliers and those with whom special disaster contracts and agreements are in effect. The plan includes a procedure for coordinating and communicating with state officials, municipalities and other public service companies and telecommunications companies, as well as with key employees and customers during a major disaster. Additionally, the plan provides for liaisons with affected electric companies' emergency operations centers when the Governor declares an emergency or at the discretion of the Commissioner of the Department of Emergency Services and Public Protection ("DESPP"). The plan also develops a flexible framework for effective business continuity and management that can be applied to events both major and minor in nature. The plan defines the threshold for business interruptions, thus authorizing the activation of the emergency recovery plan. Additionally, the plan identifies essential functions during an emergency and provides for initial and ongoing employee training, including participation in training exercises as directed by DESPP.

The Plan provides:

- A clear understanding of roles and responsibilities
- A framework for an effective emergency management process
- An understanding of tools that can support emergency recovery process

¹ As used herein, "Comcast" includes Comcast of Connecticut, Inc. (Branford, Clinton, Danbury, Groton, Hartford, Middletown, New Haven, Plainville and Vernon), Comcast of California/Connecticut/Michigan (Lakeville) and Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (Old Lyme, Seymour, Waterbury, Norwich). Comcast Phone of Connecticut, Inc. does not install, maintain, operate or control poles, wires, conduits or other fixtures under or over any public highway for the provision of telecommunications service authorized by Section 16-247c. This plan also covers Comcast's IP Phone II, LLC ("Comcast IP Phone"), and an affiliate of Comcast of Connecticut. Comcast IP Phone provides its XFINITY Voice and Comcast Business Class Voice services to Connecticut customers over Comcast of Connecticut's facilities. Comcast IP Phone does not install, maintain, operate or control poles, wires, conduits or other fixtures under or over any public highway. XFINITY Voice and Comcast Business Class Voice are interconnected VoIP services regulated by the Federal Communications Commission ("FCC").

² Comcast's IMP is filed pursuant to Public Act 12-148, "An Act Enhancing Emergency Preparedness and Response", which requires the filing with the Public Utilities Regulatory Authority ("PURA") and DESPP of updated plans for restoring service interrupted as a result of an emergency is required every two (2) years by public service companies, each telecommunications company that installs, maintains, operates or controls poles, wires, conduits or other fixtures under or over any public highway for the provision of telecommunications service authorized by Section 16-247c of the General Statutes of Connecticut, municipal utilities, and each voice-over-Internet-protocol service provider.

- An outline of best practices

As part of its business continuity planning, Comcast has business continuity plans for each of its individual facilities, emergency operations center requirements, crisis communications plans, and has contact information for all electric and telecommunications companies in Comcast's service areas.

Incident Management Team

Comcast's Western New England Regional Incident Management Team (IMT), headquartered in Berlin, CT, is the central control point for strategically deploying personnel, equipment and other Comcast resources for restoring service after an emergency, including storms. The IMT is responsible for declaring an emergency, and for declaring a return to normal business-as-usual operations. The IMT includes personnel from the Network Operations & Surveillance Center (XOC), technical operations, plant operations, construction, warehouse, and customer care departments. All of these teams work in a collaborative effort to ensure the restoration of service after an emergency.

Emergencies affect Comcast's plant, network, and facilities. Most emergencies are the result of storms. Comcast's goal is to minimize service disruptions due to severe weather. Comcast focuses on preparedness for weather-related and other types of emergencies. Comcast's technical operations managers annually complete a detailed checklist of preparations for responding to storms. Comcast has an internal "Storm Mode" Plan that includes weather monitoring, and defines when a Storm Mode is declared and the activities that should happen before, during and after a Storm Mode declaration, and for returning to business-as-usual operations.

The availability of commercial power affects the ability of Comcast's customers to receive Comcast's and Comcast IP Phone's services. For example, without commercial power customers cannot power their televisions, computers or cordless phones. Comcast's headends and network do have backup power, but full restoration of service often depends on the restoration of commercial power.

The XOC monitors Comcast's network and will initially evaluate the impacts of a storm or other emergency and convey information to assigned points of contact ("POCs") in Technical/Plant Operations, construction, warehouse and customer care departments. The XOC evaluates the number of network power supplies that are non-responding or in standby status (no longer fed from commercial status). Contact is made with local electric companies to obtain their best estimates as to when electric power will be restored, and this information is conveyed to the local Technical Operations ("Tech Ops") POC and Plant Operations ("Plant Ops") POC as a team. The Tech Ops and Plant Ops teams establish an Emergency Management Control Center for responding to the emergency.

In addition, the IMT will maintain communications with all electric and telecommunications companies in Comcast's service areas, in order to share necessary information to aid in restoration efforts.

The Western New England Government & Regulatory Affairs ("GR") team will communicate with state and municipal officials, and PURA during a major disaster or emergency and subsequent restoration. The GR team will provide daily updates to PURA and the State with respect to network and plant damage, as well as restoration efforts. The GR team will also coordinate Comcast's participation in training exercises as directed by DESPP.

Comcast's IMP is flexible and is designed to respond to events resulting in outages of different extents and durations. Comcast's efforts to restore service can depend to a large extent on electric companies'

own restoration efforts. Generally, Comcast attempts to work closely with electric companies, and begins repairs to its network or customer drops when conditions to do so are safe. In most instances, Comcast services are restored upon restoration of commercial power. If it appears from weather reports that a weather event might have an impact on Comcast's network, "Storm Mode" is declared and the IMP is activated regardless of the number of subscribers that might be affected if our network is disrupted.

Emergency/Storm Preparation

As discussed above, in making preparations for responding to storms, Comcast's Technical Operations Managers annually complete a detailed checklist of preparedness activities and responsibilities. Comcast monitors the weather, and conducts internal "storm calls" at least 24 hours in advance of any impending storm. In the event of an emergency or storm, a leader from each operational group joins an emergency response call, the purpose of which is to get agreement on 13 key area decisions as listed below.

Agree on employee safety during emergency response efforts
Agree on workforce quota strategy
Agree on rescheduling of work and ownership
Agree on downed drop strategy – schedule v. no schedule
Agree on out of service scheduling
Agree on ECD rules
Agree on outage response strategy
Agree on resource needs (In-house, Contractor, Plant, Construction)
Confirm warehouse resource availability and location
Review other facility issues/concerns
Agree on Facility Closings/Delays/Early Closure
Agreement on Interactive Voice Response (IVR) Changes
Agree on next meeting

Similar update calls with management representation will be conducted twice daily to establish progress in restoring service and review next actions to be taken by emergency response teams. These calls will

be held until all representatives agree the teams they represent are able to move back into a business as usual operational state.

Framework for Effective Emergency Management Process

Comcast's Incident Management Plan includes processes for responding to emergencies, initiated by the IMT's declaration of an emergency as well as establishing consensus with each representative of the IMT, for returning to business as usual operations.

Emergency Mode: Definition

- All essential employees, as defined by Management, need to be available to report to work
- Gas up all personal/company vehicles and ensure everyone has transportation to work
- Check all tools and test equipment, check vehicle, charge batteries, bad weather gear prepared to go
- Truck is stocked; drop cable, line equipment, etc.
- Tech trainings cancelled

Incident Command Center Assignments

Comcast uses an Incident Command Structure approach to emergency response, which includes establishment of an incident command center. The field management area leader assigns personnel to fill the roles and tasks of the Incident Command Center, as follows:

Role or Task	Who	When
Incident Command Center Room Manager		
Power/Construction telephone bridge		
Tech telephone bridge		
Secure additional technical resources		
Secure additional management resources		
Lodging		
Meals		
Facilities – commercial power		
Facilities – telephones		
Facilities – plowing, damage		
Plant restoration and design plan		
Generator inventory and deployment – check in/out		
Generator fueling		

Spare Vehicles		
Traffic Controls		

Electric Company Liaisons

The IMT shall appoint employees to act as liaisons to electric companies located in Comcast's service areas (specifically, Eversource and United Illuminating) to ensure communication and coordination of restoration efforts. The liaison will be appointed (1) whenever the Governor or President declares an emergency or major disaster; or (2) at the discretion of the Commissioner of DESPP.

Incident Command Center / Best Practices

Phones and Bridges

Two Telephone Bridge lines are open 24x7 and staffed with management and XOC personnel. One line is dedicated to commercial power and plant restoration and a second line is dedicated to Technical and Workforce Operations. If the landline bridges are disrupted, cell phones will be utilized.

- Power/Construction Telephone Bridge - Should be staffed by a plant supervisor and a construction supervisor who coordinate with power companies, with cities and towns on closed roads, monitor power supplies, communicate with Comcast's headends (main equipment facilities), deploy construction crews and communicate with technical operations supervisors.
- Technical Operations Telephone Bridge - Should be manned by technical operations supervisors or other designee. Coordinates with power/construction team, workforce ops and technicians. All techs must check in hourly and give status on safety; work completed, downed drops, roads.

Planning

- Decide on hours of operation
- Decide on Daily operations – BAU
- Additional techs and management
- Plant restoration priority
- Provide all bridge #'s to techs in the field

Logistics

- Facilities open/closures
- Commercial Power status
- Phones/Bridges set up
- Plowing arrange
- Dumpsters

Additional technical resources

- Have contact lists available
- MART team plan

- Have maps copied

Overnight accommodations

- Reserve space early - demand is high

Additional Support Resources

- Have both Dispatch and XOC personnel on site whenever possible
- Shifts of management will be needed to keep organization and give breaks.

Meals

- Provide breakfast in the morning while assigning work
- Provide dinner at the end of the day
- Consider delivering lunches to techs in the field if circumstances warrant it

Deploying generators

- Have a check-out/check-in system; use online tracking system

Assignment of Work

Consider having pre-assigned routes on spreadsheets to hand out to visiting techs and contractors. Assign later when techs arrive.

Command and Control – Field Responsibilities

Comcast's plan also outlines the field responsibilities for emergency response.

Supervisor Key Responsibilities

- Responsible for staging of emergency response in affected area.
- Mobilizes staff to staging locations. Responsible for transporting required number of drivers (refueling) transport vehicles to staging area(s).
- Issues locations of affected power supplies to Technicians. Ensures portable generators and equipment are assigned as necessary.
- Serves as communications/safety contact for all Technicians.
- Checks with each Technician every 1-2 hours.
- Contacts after-hours employees (1st pagers, 2nd home phone)

Staging Area Responsibilities

- Equipment/Resource Coordinator
- Issue portable generators and associated equipment to the field personnel.
- Track fuel truck requirements for in-service generators
- Track fuel trucks and drivers
- Document issuance and confirm return of all generators and equipment.

Staging site (In the Field)

- Each technician will check in with the Staffing Coordinator for assignment.
- Co-ordinate deployment of generators and track assignments to technicians
- Assign associated extension cords, bonding cables, rubber mats, gas cans and chains/locks and other resources as deemed necessary for proper emergency response

Network Technician (Headend, facility and power technicians)

- Ensure stability of core network and facilities
- Co-ordinate on technical bridge for delivery of facility level generators, fuel deliveries, 3rd party repairs and stability of headend and support facilities crucial to continued operations (Call centers, warehouses, Headends and technician facilities)
- Report to tech bridge any hazardous situations to facilities to determine proper HR response if any indicators of unsafe conditions

System Technician (Plant integrity technicians)

- Address node level outages in the field prioritized by Technical bridge and management team
- Install bonding cables and extension cords to power each generator.
- Monitor generators for fuel and security.
- Notify Staging Dispatcher/ Supervisor when each generator is installed and power supply is running.

Comm Techs (Customer facing technicians)

- Assisting System Technician in lifting and moving generators.
- Monitor generators for fuel and security.
- Assist with communications.
- May be assigned as re-fueling drivers
- Rehang drops per business rules (either via quota or coordinated on emergency management bridge)

Refueling drivers

- Report to assigned staging site.
- Responsible to fill the generator tanks and the portable 5 gallon gas cans.
- Remain on standby at the Staging Site.

End of Shift / End of Outage

If the outage is still in progress at the end of a technician's shift, he must stay on-site until the relief team arrives. When an outage has cleared, breakdown and remove all generators and equipment. Return equipment to the Staging Site Equipment / Resource Coordinator. Staffing Coordinator gives formal release after equipment is accounted for.

Technician's Preparation list

- Fill truck fuel tank
- Check and fill engine oil and coolant.
- Charge cell phone. Check / replace Pager batteries
- Make sure each tech has a full complement of hand tools, test equipment and safety equipment.

- Make room in truck (Service Vans, Bucket Vans and Utility Chassis) to store 2 generators. Clean out / remove unnecessary equipment.
- All normal Standby/ On-Call policies and procedures apply.
- Make sure cell phones are on during the entire duration of the shift.
- Supervisors will be on-site during the shift.

Mutual Aid Response Team (MART)

Mutual assistance is the foundation of an industry that values safety and service and it is practiced by all utilities during crises. Storms cause unplanned spikes in trouble call volumes and downed drops that can quickly overwhelm a Field Management Area's ("FMA") ability to respond. Recognizing that emergency situations may occur that are beyond the ability of an individual FMA to deal with effectively in terms of personnel, equipment and resources, the MART Team has been established.

Team Qualifications

- Must be able to operate in a disaster restoration operation under the most demanding and adverse conditions.
- Must be ready to deploy within 24 hour notice for 1 – 7 day duration.
- Must be willing and able to work various shifts and overtime as require.
- Must have strong interpersonal skills and demonstrated ability to be an effective team player.
- Must be recognized by supervisor as self-starter with ability to work with minimum supervision.
- Must be qualified with current certification in Electrical Safety, Ladder Handling/Working Aloft, Safe Driving and generator safety.
- Will be required to be boarded at hotel if more than 50 miles travel from home base or as conditions warrant. Hotel and meals will be reimbursable expenses and direct bill locations whenever possible.

Supervisor Responsibilities

- Compile and update as necessary a list of all personnel assigned to MART team. Spreadsheet to include Name, Rank, Tech #, Phone #, Work Schedule, Home # and Supervisors contact information.
- Ensure team members are current with safety certifications and training requirements.
- Once activated clears quota, training and remove from On-Call MART team members.
- Assist in backfill of geo-teams impacted by deployment.
- Compile and update as necessary an inventory of equipment and materials to support team during deployment. (reference equipment list)
- Ensure team reports to predetermined staging area to sign in and await assignment.
- Join local con-calls and meetings and resides in local command center when possible.
- Is liaison between local Incident Command (FMA manager) and MART team.
- Assigns works, coordinates materials and supplies and maintains communication with team.
- Ensure all team members have prescribed personal protective and safety equipment.
- Enforce mandatory rest periods.

MART Administration - Principles

When an emergency or disaster event requiring mutual assistance appears imminent or has occurred, the MART team supervisor should alert the team immediately. This will give members extra lead time to prepare for possible deployment. It is better to scramble everyone and not be needed than to be unprepared. This “false alarm” provides training, promotes awareness and will help the team’s ability to respond. Additionally, when summoning for outside help the same logic should apply. As soon as an FMA manager suspects that mutual assistance maybe required he/she should contact the VP of Technical Operations to provide notice that a request may be forthcoming.

MART Administration - Procedure

It is the responsibility of the FMA manager (Incident Commander) to evaluate need and initiate request for MART team assistance. The request should be made through the VP of Technical Operations either orally or written. If the request is made orally, it should be prepared in writing as soon as practical. The following information should be included in the request:

- General description of the damage sustained
- Identity of towns, number of customers and nodes effected.
- Number of down drops and customers out of service.
- The amount of personnel, equipment, materials and supplies required.
- Estimate of length of time additional resources will be needed
- The present weather conditions and pending forecast for next 24 hours
- A specific time and place for MART team to muster pending assignments.
- The identification of work conditions and special constraints such as fuel supplies, lodging/meals, reporting facilities and communications.

Upon receipt of a request for MART team aid, the VP of Technical Operations or designee will evaluate the request and shall:

- Determine which requested personnel, equipment and materials are available to meet request from within own operating area.
- Dispatch the personnel, equipment and materials to requesting FMA.
- Initiate request to adjacent operating areas and regions for mutual aid.
- When requesting mutual aid from other operating areas/regions the request should be made thru Technical Operations lead utilizing same procedure as outlined above.
- In the event that request assistance cannot be rendered it is the responsibility of the responding area/region to immediately notify requesting area.

MART Command and Control

MART team personnel rendering mutual aid shall report for direction and assignment to the FMA manager (Incident Commander) or to a predetermined staging area and await assignment. The FMA manager or designee will assume full responsibility for the leadership of personnel and command of operations at the scene. The MART team supervisor will take direction from the FMA manager (IC) and assign personnel and equipment of responding team when and where deemed necessary by assignments from FMA manager (IC). The MART team supervisor will be responsible for completion and accuracy of documentation, including but not limited to time/hour worked tracking, material requests, inventory of equipment and tools on loan, personnel deployed.

Communications with Employees and Customers

Comcast has a communications plan in place in the event that Comcast buildings are impacted by a natural disaster or a state of emergency is declared. Comcast will use different methods for communicating with employees depending on the location and severity of the situation.

Comcast's goal is to restore service to customers as soon as reasonably possible after an emergency. Comcast's IMT includes representatives from Customer Care. Comcast's emergency response plan includes procedures for notifying the Customer Care Department of any service outages, and setting up notifications for customers on the interactive voice response (IVR) system. Comcast also endeavors to ensure that a sufficient number of customer care representatives are available to respond to calls from customers during and after an emergency. When necessary, Comcast will set up special routing for customers calling in regards to storm and other emergencies.

Comcast's Public Relations Department in Connecticut handles all media inquiries and communications during and after an emergency. Comcast's Government and Regulatory Affairs personnel handle communications with state and local officials.

Comcast Public Relations:

Kristen Roberts, VP Public Relations, Western New England: 860-982-9740 (cell)

Comcast Government and Regulatory Affairs:

Daniel M. Glanville, VP Government and Regulatory Affairs: (617) 279-1146 (cell)
Sharon Codeanne, Director, Government and Regulatory Affairs: 860-937-8926 (cell)
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Disclaimer

This Incident Management Plan is being filed pursuant to Public Act 12-148, "An Act Enhancing Emergency Preparedness and Response" to provide a general overview of Comcast's general emergency response procedures. The Plan is subject to change at the Company's discretion. Comcast's filing is not intended to create a duty with respect to any of its customers or any other person or entity, and is not intended to give rise to any particular standard of care. Comcast further disclaims, without limitation, any warranty or guarantee of merchantability of fitness for any particular purpose arising from course of performance, course of dealing or from usages of trade as a result of this filing.